

McWANE,

1143 VANDERBILT ROAD INC
BIRMINGHAM INC
ALABAMA (205) 323-8284
FAX (205) 323-8284
FAX (205) 324-0431
FMAIL - IR ADVA (200) 324-0431

November 30, 2011

JEET RADIA, P.E., CIH SENIOR VICE PRESIDENT ENVIRONMENT, SAFETY & HR

Chief, Environmental Enforcement Section Environment and Natural Resources Division U.S. Department of Justice 601 D Street, NW, 2nd Floor Washington, D.C. 20004

Deborah Reyher 601 D Street, NW, 2nd Floor Washington, D.C. 20004

United States Attorney for Northern District Alabama 1801 Fourth Avenue North Birmingham, AL 35203

Director
Special Litigation and Projects Division
Office of Civil Enforcement
Bldg. Ariel Rios South, 3rd Floor, Room 3118B
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20004

Compliance Tracer, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Robert A. Kaplan
Regional Counsel
U.S. Environmental Protection Agency
Region 5
Mail Code C-14J
77 West Jackson Boulevard
Chicago, Illinois 60604

Rebecca E. Patty
Associate General Counsel
Alabama Department of Environmental Management
1400 Coliseum Blvd.
Montgomery, AL 36110-2059

Brian Hutchins
Air Compliance and Monitoring Section
lowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324

David R. Sheridan Assistant Attorney General Environmental Law Division Iowa Department of Justice Lucas State Office Building 321 East 12th Street, Room 018 Des Moines, IA 50319

James M. Proctor II McWane, Inc. 2900 Hwy 280, Suite 300 Birmingham, AL 35223

Dear Sir or Madam:

Radia

Enclosed is the Quarterly Report for the period from August 1, 2011 to October 31, 2011 as required by the Consent Decree for Civil Action No. CV-10-JEO-1902-S.

Jeet Radia

Senior Vice President – Environment, Safety & HR



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BIRMINGHAM
ALABAMA
(205) 323-8284
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EMAIL: JRADIA@MCWANE.COM

JEET RADIA, P.E., CIH SENIOR VICE PRESIDENT ENVIRONMENT, SAFETY & HR

November 30, 2011

Quarterly Report for the period from August 1, 2011 to October 31, 2011 Required Under Consent Decree for Civil Action No. CV-10-JEO-1902-S

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Jeet Radia

Senior Vice President - Environment, Safety & HR

Consent Decree under Civil Action No. [CV] 10-JEO-1902-S

McWane, Inc. Quarterly Report

AUGUST 1, 2011 - OCTOBER 31, 2011

This report is being submitted in accordance with Section VII (Reporting Requirements) of the Consent Decree. Unless otherwise specified, all information herein refers to the reporting period from August 1, 2011 to October 31, 2011.

A. STATUS OF ANY COMPLIANCE MEASURES REQUIRED UNDER SECTION V OF THE CONSENT DECREE (COMPLIANCE REQUIREMENTS).

i. Previously Completed Corrective Action:

Corrective actions identified in Appendix I of the Decree have been fully completed as of the date of lodging of the Consent Decree. McWane is maintaining documentation existing as of the date of lodging of the Consent Decree of all such corrective actions, in accordance with Section XI (Information and Document Retention) of this Decree.

ii. Storm Water Pollution Prevention Plans (SWPPP):

The Storm Water Pollution Prevention Plan procedure (EP-006) in the McWane Environmental Management System was revised on September 9, 2011. The revisions include; moving the SWPPP Deviation section to the definitions, including an additional example of a SWPPP Deviation and clarifying the benchmark monitoring requirements for state issued NPDES permits and for 2008 Multi-Sector General Permits..

iii. Clow Water Systems Company, Coshocton, Ohio:

The Cupola Emission System operated in accordance with Ohio EPA Permit PTI# 06-07432 and Appendix III of the Consent Decree.

iv. Environmental Management System:

The current McWane Environmental Management System (EMS) is fully implemented at all manufacturing facilities located in the United States. McWane is in process of implementing the EMS at the non-manufacturing facilities located in the United States.

v. Permits:

See Section D.

B. COMPLETION OF MILESTONES.

See section A (Status of Compliance Measures) and Section G (SEPs)